# BR 1 JUDGE

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Title

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State of Wisconsin	Circuit Court		Oconto Coun
STATE OF WISCONSIN	Plaintiff,	DA Case No.: Special Prosecutor: Vince Bi Agency: Oconto County She Court Case No.:	
RANDALL C. STAEVEN 430-C Nancy Lane Apt. 122 Pulaski, Wisconsin 54162	JUL 28 2010 CLERK OF COURTS	10 CF	90
DOB: 8-26-1959 Sex/Race: Male/White	oconto county, wi		dha are sa is le casa
THE STATE OF WISCONSIN TO ANY		CR	<b>IMINAL WARRAN</b>
The original criminal complaint having the defendant of committing the crime.  THE CRIME(S) OF: First Degree Intentional Homicide Arson of Building First Degree Reckless Endangerment (3 Counts) Mutilating a Corpse	DATE OF VIOLATION: 05/14/2009 05/14/2009 05/14/2009 05/14/2009 05/14/2009	CONTRARY TO WIS. S 940.01(1)(a) 943.02(1)(a) 941.30(1) 940.11(1)	STATUTE(S).:
And having found that probable cause criminal complaint and from information the defendant and bring him/herbefore MAXIMUM POSSIBLE PENALTIES AF PROVIDED A COPY OF A THE INITIAL Date July 28, 2010	n provided at hearings in case o me, or if I am not available, b RE LISTED ON THE CRIMINA	2010 JD 1, you are, therefore before some other judge of this	e, commanded to arrest s county.
Circuit Court Judge Richard Delforge			
FELONY WARRANT- BODY ONLY W.	ARRANT		
EXTRADITION: YES X ENTER: Wisconsin Only X Nat	NO tionwide Adjoin	ning Counties/States	
	CERTIFICATE OF SE	RVICE	
STATE OF WISCONSIN) ss.			
OCONTO COUNTY )			

I do certify that by virtue of the within Warrant I did on defendant and informed him/her of the crime with which **he/she** is charged.

Dated: \_\_

State of Wisconsin

BR 1 JUDGE

**Circuit Court** 

**Oconto County** 

STATE OF WISCONSIN

Plaintiff.

1.

DA Case No.:

Special Prosecutor: Vince Biskupic

Agency Case No.:

Court Case No.: 10 CF 90

RANDALL C. STAEVEN 430-C Nancy Lane Apt. 122 Pulaski, Wisconsin 54162

t. 122 Authenticated Copy

-VS-

JUL 28 2010

DOB: 8-26-1959 Sex/Race: Male/White CLERK OF COURTS OCONTO COUNTY, WI

Defendant,

**Criminal Complaint** 

Investigator Darren Laskowski of the Oconto County Sheriff's Department being first duly sworn, states that:

#### Count 1: FIRST DEGREE INTENTIONAL HOMICIDE

The above-named defendant on or about Thursday, May 14, 2009, in the Town of Chase, Oconto County, Wisconsin, did cause the death of Christine M. Staeven, date of birth 6-18-1968, with intent to kill that person, contrary to sec. 940.01(1)(a), 939.50(3)(a), 973.046(1g) Wis. Stats., a Class A Felony, and upon conviction shall be sentenced to imprisonment for life.

And furthermore, invoking the provisions of Wisconsin Statute 973.046(1g), the court may impose a deoxyribonucleic acid analysis surcharge of \$250.

#### **Count 2: ARSON OF BUILDING**

The above-named defendant on or about Thursday, May 14, 2009, in the Town of Chase, Oconto County, Wisconsin, by means of fire, did intentionally damage a building (the home at 740 Jaworski Road) belonging to Christine M. Staeven, without that person's consent, contrary to sec. 943.02(1)(a), 939.50(3)(c), 973.046(1g) Wis. Stats., a Class C Felony, and upon conviction may be fined not more than One Hundred Thousand Dollars (\$100,000), or imprisoned not more than forty (40) years, or both.

And furthermore, invoking the provisions of Wisconsin Statute 973.046(1g), the court may impose a deoxyribonucleic acid analysis surcharge of \$250.

### Count 3: FIRST DEGREE RECKLESS ENDANGERMENT

The above-named defendant on or about Thursday, May 14, 2009, in the Town of Chase, Oconto County, Wisconsin, did recklessly endanger the safety of K.S., female/juvenile, date of birth 4-23-1998, under circumstances which show utter disregard for human life, contrary to sec. 941.30(1), 939.50(3)(f), 973.046(1g) Wis. Stats., a Class F Felony, and upon conviction may be fined not more than Twenty Five Thousand Dollars (\$25,000), or imprisoned not more than twelve (12) years and six (6) months, or both.

And furthermore, invoking the provisions of Wisconsin Statute 973.046(1g), the court may impose a deoxyribonucleic acid analysis surcharge of \$250.

### Count 4: FIRST DEGREE RECKLESS ENDANGERMENT

The above-named defendant on or about Thursday, May 14, 2009, in the Town of Chase, Oconto County, Wisconsin, did recklessly endanger the safety of W.S., male/juvenile, date of birth 3-2-2002, under circumstances which show utter disregard for human life, contrary to sec. 941.30(1), 939.50(3)(f), 973.046(1g) Wis. Stats., a Class F Felony, and upon conviction may be fined not more than Twenty Five Thousand Dollars (\$25,000), or imprisoned not more than twelve (12) years and six (6) months, or both.

And furthermore, invoking the provisions of Wisconsin Statute 973.046(1g), the court may impose a deoxyribonucleic acid analysis surcharge of \$250.

## Count 5: FIRST DEGREE RECKLESS ENDANGERMENT

The above-named defendant on or about Thursday, May 14, 2009, in the Town of Chase, Oconto County, Wisconsin, did recklessly endanger the safety of B.S., male/juvenile, date of birth 3-1-2006, under circumstances which show utter disregard for human life, contrary to sec. 941.30(1), 939.50(3)(f), 973.046(1g) Wis. Stats., a Class F Felony, and upon conviction may be fined not more than Twenty Five Thousand Dollars (\$25,000), or imprisoned not more than twelve (12) years and six (6) months, or both.

And furthermore, invoking the provisions of Wisconsin Statute 973.046(1g), the court may impose a deoxyribonucleic acid analysis surcharge of \$250.

#### Count 6: MUTILATING A CORPSE

The above-named defendant on or about Thursday, May 14, 2009, in the City of Appleton, Outagamie County, Wisconsin, did mutilate the corpse of Christine M. Staeven, date of birth 6-18-1968 with the intent to conceal a crime contrary to sec. 940.11(1), 939.50(3)(f), 973.046(1g) Wis. Stats., a Class F Felony, and upon conviction may be fined not more than Twenty Five Thousand Dollars (\$25,000), or imprisoned not more than twelve (12) years and six (6) months, or both.

And furthermore, invoking the provisions of Wisconsin Statute 973.046(1g), the court may impose a deoxyribonucleic acid analysis surcharge of \$250.

#### PROBABLE CAUSE:

AND PRAYS SAID DEFENDANT BE DEALT WITH ACCORDING TO LAW; AND THAT THE BASIS FOR THE COMPLAINANT'S CHARGE OF SUCH OFFENSE IS AS FOLLOWS:

Investigator Darren Laskowski of the Oconto County Sheriff's Department reports that he has reviewed his own reports, the reports of other officers with the Oconto County Sheriff's Department, reports of the Wisconsin Department of Justice (Division of Criminal Investigations) kept in the regular and ordinary course of business. Investigator Laskowski has also observed and reviewed testimony from a hearing held in Oconto County Case 2010 JD 1. Investigator Laskowski reports that information from those sources reveal the following:

On Thursday, May 14, 2009 at approximately 5:00 a.m., firefighters from the Pulaski Fire Department were dispatched to a fire in the home of Christine M. Staeven, d.o.b. 6-18-1969, at 740 Jaworski Road in the Town of Chase, Oconto County, Wisconsin. Firefighter James Mroczkowski observed flames coming out of the back side of the residence. After Mroczkowski and other firefighters extinguished the fire, the deceased body of Christine M. Staeven was located by law enforcement officers and fire fighters in center bedroom in the back of the house. Mroczkowski reported to Special Agent Peter Thelen of the Wisconsin Department of Justice that upon his arrival at the scene at 740 Jaworski Road that morning, the majority of the flames were coming out from the area of that bedroom.

Also, on the morning of May 14, 2009, Special Agent Kevin Heimerl of the Wisconsin Department of Justice (State Fire Marshall's Office) was dispatched to the residence at 740 Jaworski Road in the Town of Chase. As a trained fire investigator for the State Fire Marshall's Office, Heimerl was assigned to do an examination and investigation of the fire scene. Based on Heimerl's interviews of witnesses, examination of the scene, and overall investigation, he offered the following opinions of the cause and origin of the fire: (1) there were three separate areas of fire origin identified in the home, including the north bedroom, the central bedroom and the top of the kitchen stove and (2) the fire was an intentionally set fire classified as "incendiary". During testimony at a hearing in 2010 JD 1 conducted in Oconto County Circuit Court, Heimerl indicated that the fire was intentionally started in the home of Christine Staeven and was an arson fire.

Special Agent Heimerl also reports that the deceased body of Christine Staeven was examined by a forensic pathologist Dr. Mark Witeck at St. Vincent's Hospital in Green Bay, Wisconsin on May 15, 2010. Dr. Witeck reported to Heimerl that there was no evidence that Christine Staeven died as a result of the fire at the home on the morning of May 14, 2009. The doctor found no soot in the deceased's airway. The doctor concluded that Christine Staeven died prior to the fire. Dr. Witeck informed Special Agent Heimerl that Christine Staeven's death was most likely a homicide based on his autopsy and review of the investigative reports. The doctor also informed Heimerl that the top of the head, skull and brain as well as most of the arms, legs and surface skin of the body were burned away as a result of the fire. The doctor reported that extensive burning would destroy many injuries.

In interviews with law enforcement officers, Christine Staeven's daughter K.S., d.o.b. 4-23-1998 reports that she and her younger brothers W.S., d.o.b. 3-2-2002 and B.S., d.o.b. 3-1-2006 had been asleep in the home overnight at the time of the fire. K.S. reported to Special Agent Michael Rindt of the Wisconsin Department of Justice that she was awakened on the early morning of Thursday, May 14, 2009 in the home at 740 Jaworski Road by the smell of fire, the fire alarm going off, and her brother K.S. screaming. She reported that she saw fire in two of the bedrooms in the home. She was eventually able to located her two brothers and assist them out of the burning home. She reports that the three of them eventually went to a neighbor's home for assistance. K.S. indicated to investigators that she her mother alive and well on the previous night before she and her brothers went to bed. K.S. reported that her father Randall C. Staeven (d.o.b. 8-26-1959) had not been living in the house since approximately January of 2009 because her parents were going through a divorce.

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Investigator Laskowski reports that he interviewed Scott C. Heitzke, d.o.b. 7-25-1972, the nephew of Randall C. Staeven, on June 10, 2009. Scott reported that he has known Randall Staeven for his entire life. Scott reported that four days prior to the fire, he and his girlfriend Maureen Schlag were with Randall Staeven at a home on Nancy Lane in the City of Pulaski. Scott reported that on that day, Randall was complaining about Christine Staeven and mentioned that he may lose the family home on Jaworksi Road as a result of their pending divorce. Scott said that Randall was "very bitter" about the divorce and is a "very angry" person. Scott reported to the investigator that Randall made the following comment to him four days before the fire: "I'd rather see the bitch dead and the house burn down." Scott also reported to the investigator that in the past Randall has stated that he should kill or "shoot" the bitch, referring to his wife Christine Staeven.

Investigator Laskowski reports that he conducted an interview of Maureen Schlag on June 14, 2009. Maureen reported that she was with Randall Staeven and Scott Heitzke at a home on Nancy Lane in Pulaski, Wisconsin four days before the May 14, 2009 fire at the Jaworski Road home. Maureen reported that at that time she heard Randall Staeven talking about Christine Staeven. She reports that Randall said that he did not want the house on Jaworski Road to go to Christine Staeven because of the divorce. Maureen also reported that Randall said "I want the slut dead and the house to burn down."

Investigator Laskowski reports he has reviewed records from the time period of Randall Staeven's approximately 10 years of marriage to Christine Staeven. He reports that there was a history of domestic abuse between the two and that Randall Staeven was ordered to go into anger management counseling. Laskowski reports that Randall provided information on July 14, 2010 at a hearing in case 2010 JD 1 in Oconto County Circuit. At that time, Randall confirmed that he had a prior history of verbal and physical abuse with Christine. He also indicated that he had anger management counseling in the past and had been taking medication for anger management in the past. He also confirmed that Christine Staeven had left him several times during their marriage to stay with relatives or at domestic abuse shelters. Randall Staeven reported that he learned in late 2008 and early 2009 that Christine had been having dating relationships with at least two other men. He confirmed that in January of 2009, Christine obtained a domestic abuse restraining order against him and had Randall removed from the home on Jaworski Road.

Investigator Laskowski reports that as of May 14, 2009, Randall Staeven owned and operated a white 1999 GMC Jimmy SUV. Randall kept possession of the vehicle and continued to use it after he was ordered to move out of the residence at 740 Jaworski Road due to the domestic abuse restraining order.

In late May of 2009, Special Agent Heimerl interviewed Tim Saindon who lives on Franks Lane in the Town of Chase. Saindon reported that he lives around the corner from Christine Staeven's home at 740 Jaworski Road. Saindon reported that he was familiar with the white SUV used by Randall Staeven and often parked in the driveway at the home at 740 Jaworksi Road in the past. Saindon reported that on the morning of the fire on May 14, 2009, he was heading to work in his vehicle between 4:00 a.m. and 4:15 a.m. and stopped at the stop sign at the intersection of Jaworski Road and Franks Lane. He reported that this intersection is only about 150 yards south of the Christine Staeven residence.

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Saindon reported that on that morning of May 14, 2009 between 4:00 and 4:15 a.m., he observed the same white SUV that had been parked at the Staeven residence in the past traveling southbound on Jaworski Road past the intersection at Franks Lane. Saindon reports that he noticed that the driver was a heavier set or bigger white male. He stated that the male driver put his left hand up to cover his face as he drove by where Saindon had his vehicle positioned. Investigator Laskowski reports that as of May 14, 2009, Randall Staeven was a heavy set white male individual.

Investigator Laskowski reports that at a hearing on July 27, 2009 in Case 2010 JD 1 in Oconto County Circuit Court, Judge Richard Delforge found that there was probable cause that the above-referenced crimes were committed by Randall Staeven on or about May 14, 2009.

Subscribed and sworn to before me, and approved for filing on:

This 28th day of July, 2010

Complainant—Darren Laskowski

Special Prosecutor for Oconto County

State Bar No. 1006342